

Rural Telephone Coalition

March 27, 1996

RECEIVED

MAR 27 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: Federal-State Joint Board on Universal
Service
CC Docket No. 96-45

Dear Mr. Caton:

Please find enclosed for filing the original and nine copies of the Rural Telephone Coalitions' petition in the above-captioned proceeding.

Thank you for your assistance in this matter.

Sincerely,

The Rural Telephone Coalition

By: Margot Smiley Humphrey
Margot Smiley Humphrey
NRTA

By: David Cosson
David Cosson
NTCA

By: L. M. Zaina
Lisa M. Zaina
OPASTCO

RECEIVED

MAR 27 1996

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Federal-State Joint Board on
Universal Service

)
)
)
)
)
)

CC Docket No. 96-45

PETITION OF
THE RURAL TELEPHONE COALITION

The Rural Telephone Coalition
21 Dupont Circle, NW
Suite 700
Washington, DC 20036
(202) 659-5990

March 27, 1996

RECEIVED

MAR 27 1996

Before the
Federal Communications Commission
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Federal-State Joint Board on) CC Docket No. 96-45
Universal Service)
)

**PETITION FOR EXTENSION OF PAGE LIMITATION
OF THE RURAL TELEPHONE COALITION**

I. Introduction

The Rural Telephone Coalition (RTC) comprised of the National Rural Telecom Association (NRTA), the National Telephone Cooperative Association (NTCA) and the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) hereby petitions the Federal Communications Commission (FCC or Commission) to grant an extension of the 25 page limit¹ for comments and reply comments, respectively, imposed by the FCC in the above-captioned proceeding. The RTC requests that it be granted a 50-page limit for both the comments and the reply comments.

II. Petition

Together the three associations that comprise the RTC represent approximately 850 small and rural local exchange carriers (LEC) across the United States. The three associations worked together as the RTC during the legislative process that precipitated this proceeding and,

¹In the Matter of Federal-State Joint Board on Universal Service, Notice of Proposed Rulemaking and Order Establishing Joint Board, CC Docket No. 96-45, March 8, 1996, paragraph 143 (NPRM).

consistent with Commission's requests to collaborate where possible, decided that we would file as the RTC with the FCC.

The collaboration among the three associations will be beneficial to the Commission, and consistent with its requests. As the RTC, we will be representing a broader base of small and rural LECs. By our collaboration and subsequent reduction of pages that we will file as a coalition as opposed to individual associations, we will be doing our part to accommodate the FCC in its daunting task to complete a monumental number of proceedings in the short period of time allowed by the Congress. This proceeding is critically important to us, as it clearly was to Congress, and we believe that its resolution is of paramount importance.

However, while accommodating the FCC's request to work together, we do disadvantage ourselves in the process. Working separately, we would have 75 pages with which to work. Without an extension, we are limited to 25 pages. This proceeding is likely to control the development of an advanced infrastructure and the promotion and advancement of universal service in rural areas. Furthermore, we undertook a great effort to work with Congress in the legislative process in the establishment of the principles on which this proceeding is based. Therefore, we have many ideas about universal service that we would like to share with the Commission in this proceeding.

The FCC's NPRM is 64 pages long, single-spaced. The Commission requests comment on close to 200 issues. A proper discussion of even half of these issues would be difficult in the space permitted by the Commission. Twenty-five pages, double-spaced will not allow the RTC to fully discuss the issues of importance to the small and rural LECs and communities.

III. Conclusion

Accordingly, the RTC respectfully requests that the FCC grant its extension and permit it to file comments and reply comments of up to 50 pages each.

Respectfully submitted,

THE RURAL TELEPHONE COALITION

National Rural Telecom Association

By: Margot Smiley Humphrey
Margot Smiley Humphrey

Koteen & Naftalin, LLP
1150 Connecticut Ave., NW, Suite 1000
Washington, DC 20036
(202)467-5700

National Telephone Cooperative Association

By: David Cosson
David Cosson

2626 Pennsylvania Ave., NW
Washington, DC 20037-1695
(202)298-2300

Organization for the Promotion and Advancement of Small Telecommunications Companies

By: Lisa M. Zaina
Lisa M. Zaina

21 Dupont Circle, NW, Suite 700
Washington, DC 20036
(202)659-5990

March 27, 1996